

NRC INSPECTION MANUAL

PART 9900: 10 CFR GUIDANCE

50B_VIIP.CFR

10 CFR 50, APPENDIX B, VII GUIDANCE - PROCUREMENT OF SPARE AND REPLACEMENT PARTS

A. PURPOSE

The purpose of this document is to provide guidance to the inspector regarding the applicability of QA program requirements for the procurement of spare and replacement parts.

B. DISCUSSION

10 CFR 50, Appendix B, Criterion VII states, in part, that measures should be established to assure that purchased material, equipment and services, whether purchased directly or through contractors and subcontractors conform to the procurement documents.

Experience has shown that a certain degree of confusion exists concerning the applicability of Criterion VII to spare and replacement parts which may be in the form of off-the-shelf or non-off-the-shelf items. The confusion factor is also increased when safety-related components are procured and stored under a consortium or co-ownership association, until needed by one of the members of the consortium or association. The following questions and responses are provided to give the regulatory position for several of the possible concerns.

C. SPECIFIC GUIDANCE

1. Question. Which QA requirements are applicable for spare or replacement parts?

Response. The controlling QA requirements are those of each individual licensee that are passed down the procurement chain. The requirements of each licensee can be expected to vary in specifics, from product to product, and for the same product since the application may be different. It should be noted that some licensee QA programs were reviewed and approved by the NRC as long as ten or more years ago, therefore, the applicable QA requirements are those to which each licensee has committed in his SAR. The only changes to these are those which he has voluntarily made on new regula-

tions or commission orders (not Regulatory Guides) which could preempt his original commitments.

2. Question. What vintage quality assurance program should be applied for the procurement of off-the-shelf and non-off-the-shelf items?

Response. The QA program applicable to spare part procurement whether for immediate or later use is the one to which a specific licensee is committed. However, the type and amount of QA required is "to an extent consistent with the importance to safety of the item" as described in Criterion II.

It should be noted that for those components which are classified as an ASME code item, the manufacturer must comply with the latest code issue in order to obtain renewal of his certificate of authorization (N-Stamp). This ensures some updating but does not apply to noncode parts.

3. Question. What QA program requirements should be imposed on spare or replacement parts that are:
 - a. Destined to be stored (warehoused) by either the procurer or supplier until needed?
 - b. Destined to be stored by either the procurer or supplier under a consortium, or a co-ownership association, until needed by one of the members of the consortium or association?
 - c. When such stored items are later needed, what actions (e.g., upgrading) would be necessary before the items are actually used?

Response. As described in responses for items A and B above, the applicable QA requirements are those to which the specific licensee is committed. Generally, stored items should not require upgrading if a proper pedigree is available and assuming no degradation has occurred. However, if some new condition is identified which makes the part unsuitable for use, upgrading or procurement of a new part would be required. The licensee is responsible for determining the adequacy of such items.

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